

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

ESTATE OF SWANNIE HER, CONNIE HER,
CHONG HER, EKin HER, JASMINE HER,
ALEXANDER HERNANDEZ, EVANGELIN HER,
CHUEXNG HER, THVON HER, JOVANYEL
RAMIREZ-CHANG, JHOVANNY RAMIREZ-CHANG,
and CHUEVE HER,

Plaintiffs,

CASE NO. 17-CV-1015

v.

KRAIG SADOWNIKOW, CRAIG HOEPPNER,
RYAN ZAMROW, BROGAN ZOCHERT, MICHAELA
MILLARD, CASSIDY HOLBROOK, NOAH WILKENS,
MADELINE KAPHINST, ABIGAIL EHMKE, CITY OF
WEST BEND and THE LEAGUE OF WISCONSIN
MUNICIPALITIES MUTUAL INSURANCE COMPANY,

Defendants.

DEFENDANTS' NOTICE AND MOTION FOR A PROTECTIVE ORDER

PLEASE TAKE NOTICE that Defendants, by their attorneys, MUNICIPAL LAW & LITIGATION GROUP, S.C., hereby move the Court, the honorable Nancy Joseph presiding, for a protective order quashing: (1) Plaintiff's Fourth Request for Production to the extent it seeks materials contained within a claim adjustor's file which are protected from disclosure by the work-product doctrine, including investigative reports, recorded conversations and photographs obtained in anticipation of litigation; and (2) the Deposition Notice of James Pohlman.

This Motion is brought pursuant to Fed. R. Civ. P. 26(c) and is supported by the accompanying Brief, the Affidavit of Matteo Reginato, the Affidavit of Anthony Conlin, and the

Affidavit of James Pohlman. Defendants seek the costs and disbursements associated with preparing and submitting this Motion.

Dated this 31st day of May, 2018.

MUNICIPAL LAW & LITIGATION GROUP, S.C.
Attorneys for Defendants, Kraig Sadownikow,
Craig Hoepfner, Ryan Zamrow, Brogan Zochert,
Michaela Millard, Cassidy Holbrook, Noah
Wilkens, Madeline Kaphingst, Abigail Ehmke, City
of West Bend and The League of Wisconsin
Municipalities Mutual Insurance Company.

By: /s/ Matteo Reginato
REMZY D. BITAR
State Bar No: 1038340
MATTEO REGINATO
State Bar No: 1089724
LUKE A. MARTELL
State Bar No. 1103301

730 N. Grand Avenue
Waukesha, WI 53186
O: (262) 548-1340
F: (262) 548-9211
E: rbitar@ammr.net
mreginato@ammr.net
lmartell@ammr.net